

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**UNITED STATES OF AMERICA**  
**Plaintiff,**

**vs.**

**CARLOS I. URESTI,**  
**Defendant.**

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**Case No. SA-17-CR-381(1)-DAE**

**JOINT MOTION FOR ENTRY OF  
AGREED ORDER PARTIALLY LIFTING THE RESTRAINING ORDER**

Plaintiff UNITED STATES OF AMERICA and Defendant CARLOS I. URESTI file this Joint Motion for an Agreed Order Partially Lifting the Restraining Order entered by the Court, showing as follows:

1. On February 22, 2018, a jury found the Defendant guilty on six counts of wire fraud, one count of conspiracy to launder money instruments, one count of engaging in monetary transactions in property, two counts of securities fraud, and one count of acting as an unregistered securities broker. (Doc. No. 318).

2. On March 6, 2018, the Court entered an Ex Parte Restraining Order. (Doc. No. 323).

3. On June 26, 2018, Defendant was sentenced to one hundred forty four months incarceration, three years supervised release and to pay a \$1,100.00 special assessment and \$6,345,441.00 in restitution. (Doc. No. 407).

4. Since his conviction, the Defendant has maintained several bank accounts which the parties agree should be closed. These bank accounts consist of a law firm operating account at Broadway Bank (4356), a law firm IOLTA account at Broadway Bank (4357) and a campaign account at Broadway Bank (4359). The parties agree that Defendant can continue to maintain a personal account at Broadway Bank (4358).

5. The parties request that the Restraining Order be partially lifted to permit the closure of the three accounts identified above.

WHEREFORE, the Parties pray that the proposed agreed order be approved and entered by the Court.

Respectfully submitted,

**JOHN F. BASH,**  
UNITED STATES ATTORNEY

By: /s/ Erica Benites Giese

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**AGREED:**

/s/ Carlos Uresti  
**CARLOS URESTI**  
***Defendant***  
c/o Mikal Watts  
Watts, Guerra, LLP  
4 Dominion Drive, Bldg 3, Suite 100  
San Antonio, Texas 78257

**APPROVED AS TO FORM:**

/s/ Alicia D. O'Neill  
**ALICIA D. O'NEILL**  
1207 South Shepherd Street  
Houston, Texas 77019  
***Attorney for Defendant***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Joint Motion for Entry of Agreed Order to Partially Lift Restraining Order was electronically filed via the Court's CM/ECF system on **December 11, 2018** and notice sent to the following:

Rashin Mazaheri  
Dryer & Mazaheri, PLLC  
Attorneys and Counsellors At Law  
111 Soledad Street, Suite 110  
San Antonio, Texas 78205  
***Attorney for Defendant***

John J. Ritenour, Jr.  
THE RITENOUR LAW FIRM  
111 Soledad, #850  
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***Attorney for Defendant***

Mikal C. Watts  
Watts, Guerra, LLP  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, Texas 78257  
***Attorney for Defendant***

and I further certify its mailing by United States Postal Service to the following:

Alicia Devoy O'Neill  
1207 South Shepherd Street  
Houston, Texas 77019  
***Attorney for Defendant***

/s/ Erica Benites Giese

**ERICA BENITES GIESE**

Assistant United States Attorney

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**AGREED ORDER**

Came on to be heard the United States of America's Joint Motion for Entry of Agreed Order Partially Lifting the Restraining Order. After consideration of the motion, the Court finds the relief is appropriate and the motion should be GRANTED.

**IT IS THEREFORE ORDERED** that the Court's Ex Parte Restraining Order (Doc. No. 323) is **LIFTED** solely so that the Defendant may close his law firm operating account (4356), a law firm IOLTA account (4357) and a campaign account (4359).

**IT IS FURTHER ORDERED** that the Ex Parte Restraining Order remains in all other respects in effect as to the Defendant's property and interests in property.

Dated \_\_\_\_\_

\_\_\_\_\_  
**DAVID ALAN EZRA**  
SENIOR UNITED STATES DISTRICT JUDGE